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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

19 OWEN DIAZ,  
20 Plaintiff,  
21 v.  
22 TESLA, INC. d/b/a TESLA MOTORS, INC.,  
23 Defendant.

Case No. 3:17-cv-06748-WHO  
**DEFENDANT TESLA, INC.'S NOTICE  
OF SUBMISSION OF PROPOSED  
REVISED DRAFT PRELIMINARY JURY  
INSTRUCTIONS**

Judge: Hon. William H. Orrick

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Please take notice that, in response to the Court's request made at the Final Pretrial  
3 Conference on February 27, 2023, Defendant Tesla, Inc. ("Tesla") hereby submits as **Exhibit A**  
4 hereto its proposed revisions to the Draft Preliminary Jury Instructions prepared by the Court and  
5 provided to the parties on February 24, 2023. Tesla submits its attached proposed revisions subject  
6 to and without waiving its previously asserted objections to, or requests for, jury instructions,  
7 including as contained in the parties' Joint Proposed and Disputed Jury Instructions (Dkt. 389).

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9 DATED: February 28, 2023

By: */s/ Daniel C. Posner*

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